

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

D.N.J. LBR 2016-1 FEE APPLICATION COVER SHEET

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Debtor: LTL Management LLC Applicant: Bailey Glasser LLP
Case No.: 21-30589 (MBK) Client: Official Committee of Talc Claimants
And Official Committee of Talc Claimants II¹
Chapter: 11 Case Filed: October 14, 2021

COMPLETION AND SIGNING OF THIS FORM CONSTITUTES A CERTIFICATION
UNDER PENALTY OF PERJURY, PURSUANT TO 28 U.S.C. SECTION 1746

RETENTION ORDER ATTACHED

**SECOND INTERIM APPLICATION OF BAILEY & GLASSER LLP
AS COUNSEL TO THE OFFICAL COMMITTEE OF TALC CLAIMANTS AND
THE OFFICIAL COMMITTEE OF TALC CLAIMANTS FOR
COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES FOR THE PERIOD
FROM FEBRUARY 1, 2022 THROUGHT MAY 31, 2022**

**SECTION I
FEE SUMMARY**

Second Interim Fee Application Covering The Period
February 1, 2022 Through May 31, 2022

Interim Fee Application No. 2.

Summary of Amounts Requested for the Period from February 1, 2022 through May 31, 2022
(the "Second Application Period"):

Total Fees Previously Requested:	\$ 2,152,745.00
Total Expenses Received:	\$ 206,123.66 ²
Total Previous Holdback/Unpaid Balance:	\$ 430,549.00
Total Fees Received:	\$ 1,722,196.00 ³

¹ The monthly fee statements for the periods ending April 30, 2022 and May 31, 2022 are for representation of the Official Committee of Talc Claimants, the monthly fee statement for the month ending March 31, 2022 included services performed for the Official Committee of Talc Claimants and the Official Committee of Talc Claimants II. The monthly fee statement for February, 2022 was for representation of the Official Committee of Talc Claimants II. The representation change was due to the United States Trustee's restructuring of the original Official Committee of Talc Claimants into two committees and the Bankruptcy Court's subsequent reconstitution of the original talc creditors' committee.

² This includes \$25,513.11 in expenses which have not been paid as of the date of this application, but in the ordinary course of payment of monthly fee statements should be paid prior to a hearing on this application.

³ This includes \$277,048.00 in fees which have not been paid as of the date of this application, but in the ordinary course of payment of monthly fee statements should be paid prior to a hearing on this application.

Total Fees and Expenses Received by Bailey
Glasser LLP

\$ 1,928,319.66

FEE TOTALS: **\$2,152,745.00**
DISBURSEMENT TOTALS: **\$ 206,123.66**
TOTAL FEE APPLICATION: **\$2,358,868.66**

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (Or Years Of Professional Service)	HOURS	RATE	FEE
1. Robert R Bell, Partner	1993	252.4	\$850.00	\$214,540.00
2. D. Todd Matthews, Partner	1996	210.9	\$750.00	\$158,175.00
3. John G. Turner III, Partner	1989	223.2	\$850.00	\$189,720.00
4. Kevin W. Barrett, Partner	1987	252.9	\$975.00	\$246,577.50
5. Kate E. Charonko, Partner	2011	190.6	\$750.00	\$142,950.00
6. Brian A. Glasser, Partner	1994	294.7	\$975.00	\$287,332.50
7. Cary L. Joshi, Partner	2002	185.3	\$750.00	\$138,975.00
8. David L. Selby, Partner	1990	137.3	\$750.00	\$102,975.00
9. Patricia M. Kipnis, Partner	2003	2.0	\$750.00	\$1,500.00
10. Maggie B. Burris, Partner	2014	191.0	\$750.00	\$143,250.00
11. Leslie A. Brueckner, Partner	1988	9.0	\$750.00	\$6,750.00
12. Thomas B. Bennett, Of Counsel	1976	276.7	\$975.00	\$269,782.50
13. Thanos Basdekis, Of Counsel	1997	107.0	\$800.00	\$85,600.00
14. Elliott C. McGraw, Associate	2010	40.1	\$550.00	\$22,055.00
15. Tony L. Clackler, Associate	2014	19.4	\$550.00	\$10,670.00
16. Nicole L. Ballante, Associate	2016	175.6	\$550.00	\$96,580.00
17. Christina T. Natale, Associate	2015	17.7	\$550.00	\$9,735.00
18. Jason E. Kittinger, Paralegal	N/A	76.4	\$325.00	\$24,830.00
19. Noah C. Wilbur, Paralegal	N/A	2.3	\$325.00	\$747.50
20. TOTAL FEES		2,664.5		\$2,152,745.00
21. BLENDED RATE			\$807.94	

SECTION II SUMMARY OF SERVICES

SERVICES RENDERED	HOURS	FEE
a) Asset Analysis and Recovery: Identification and review of potential assets including causes of action and non-litigation recoveries.	0	\$0
b) Asset Disposition Sales, leases (section 365 matters), abandonment and related transaction work related to asset disposition.	0	\$0
c) Assumption and Rejection of Leases and Contracts Analysis of leases and executory contracts and preparation of motions specifically to assume or reject.	0	\$0
d) Avoidance Action Analysis Review of potential avoiding actions under Sections 544–549 of the Code to determine whether adversary proceedings are warranted.	0	\$0
e) Budgeting (Case) Preparation, negotiation, and amendment to budgets for applicant.	0	\$0
f) Business Operations Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.	0.3	\$247.50
g) Case Administration Coordination and compliance activities not specifically covered by another category.	201.4	\$146,482.50
h) Claims Administration and Objections Specific claim inquiries; bar date motions; analyses, objections and allowances of claims.	17.4	\$13,050.00
i) Corporate Governance and Board Matters Preparation for and attendance at Board of Directors meetings; analysis and advice regarding corporate governance issues, including trustee, examiner, and CRO issues; review and preparation of corporate documents (e.g., articles and bylaws, etc.).	0	\$0
j) Employee Benefits and Pensions Review and preparation related to employee and retiree benefit issues, including compensation, bonuses, severance, insurance benefits, and 401K, pensions, or other retirement plans.	0	\$0
k) Employment and Fee Applications Preparation of employment and fee applications for self or others; motions to establish interim procedures.	122.4	\$111,325.00
l) Employment and Fee Application Objections Review of and objections to the employment and fee applications of others.	23.8	\$20,700.00

m) Litigation Contested Matters and Adversary Proceedings (not otherwise within a specific project category), each identified separately by caption and adversary number, or title of motion or application and docket number, and using the Uniform Task Based Management System (“UTBMS”) Litigation Task Code Set.	2,031.5	\$1,632,510.00
n) Meetings and Communications with Creditors Preparation for and attendance at section 341(a) meeting and any other meetings with creditors and creditors’ committees.	112.8	\$99,470.00
o) Non-Working Travel Non-working travel where the court reimburses at less than full hourly rates.	122.0	\$101,327.50
p) Plan and Disclosure Statement Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to the allowance and objections to allowance of claims.	8.1	\$7,717.50
q) Real Estate Review and analysis of real estate-related matters, including purchase agreements and lease provisions (e.g., common area maintenance clauses).	0	\$0
r) Relief from Stay and Adequate Protection Matters relating to termination or continuation of automatic stay under 11 U.S.C. 362 and motions for adequate protection under 11 U.S.C. 361.	24.8	\$19,915.00
s) Reporting Statement of financial affairs, schedules, monthly operating reports, and any other accounting or reporting activities; contacts with the United States Trustee not included in other categories.	0	\$0
t) Tax Analysis of tax issues and preparation of federal and state tax returns.	0	\$0
u) Valuation Appraise or review appraisals of assets.	0	\$0
SERVICE TOTALS:	2,664.5	\$2,152,745.00

**SECTION III
SUMMARY OF DISBURSEMENTS**

DISBURSEMENTS	DOLLAR AMOUNT
a) Copies	\$197.50
b) Outside Printing	\$775.99
c) Telephone	\$0.00
d) Facsimile	\$0.00
e) Online Research	\$6,402.58
f) Delivery Services/Couriers	\$160.55
g) Postage	\$0.00
h) Local Travel	\$0.00
i) Out-of-town Travel	\$0.00
j) Out-of-town Travel: Transportation	\$3,764.80
k) Out-of-town Travel: Hotel	\$32,822.40
l) Out-of-town Travel: Meals	\$975.83
m) Out-of-town Travel: Ground Transportation	\$4,214.52
n) Out-of-town Travel: Other--Tolls & Parking	\$472.75
o) Meals (local)	\$0.00
p) Court Fees	\$2,749.00
q) Subpoena Fees	\$0.00
r) Witness Fees	\$0.00
s) Deposition Transcripts	\$68,422.70
t) Trial Transcripts	\$0.00
u) Trial Exhibits	\$0.00
v) Litigation Support Vendors	\$87,316.02
w) Experts	\$0.00
x) Investigators	\$0.00

DISBURSEMENTS	DOLLAR AMOUNT
y) Arbitrators/Mediators	\$0.00
z) Other-tolls, NJ Lawyers' Fund, fuel for rental vehicles, internet, business center use, CD Disco, conference room use, refunds	-\$2,150.98
DISBURSEMENTS TOTAL:	\$206,123.66

I certify under penalty of perjury that the above is true.

Dated: June 23, 2022

/s/ Thomas B. Bennett

Thomas B. Bennet